

EXHIBIT C

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LIFEWATCH SERVICES INC.

Plaintiff,

v.

BRAEMAR, INC. and
ECARDIO DIAGNOSTICS, LLC,

Defendants.

Civil Action No. 09-CV-6001

DECLARATION OF CRAIG FOLEY

I, Craig Foley, do hereby declare:

1. I am the Vice President of LifeWatch Services, Inc., in charge of its Core Services division. I have been employed by the company (including its predecessors) since December of 1996.
2. This declaration is being submitted in connection with LifeWatch's Reply in Support of Motion to Disqualify Robert Schwarzbarg from Serving as an Expert for Defendants, Preclude Robert Schwarzbarg from Consulting with Defendants, and Strike the Schwarzbarg Declaration.
3. On or about October 16, 1996, LifeWatch, Inc. merged with CardioLife Corp. of Boca Raton, Florida. The merged companies used the LifeWatch name and were based at Ralin Medical, Inc.'s Illinois headquarters. LifeWatch, Inc. also maintained operations in Boca Raton.
4. Prior to June of 1999, LifeWatch, Inc. was a subsidiary of Ralin Medical, Inc. (also known as Ralin, Inc.).

5. On or about June 1, 1999, LifeWatch, Inc. was sold to Sabratek.

6. On or about January 18, 2000, LifeWatch, Inc. pursuant to a court ordered procedure entered into an Asset Purchase Agreement with Urs Acquisitions, Inc. pursuant to which Urs Acquisitions, Inc. purchased substantially all of the assets of LifeWatch, Inc., which included assets related to the business of Ralin Medical, Inc., including the '143 Patent. The acquisition was consummated on or about January 27, 2000.

7. Urs Acquisitions, Inc. continued to operate LifeWatch's business after the assets of LifeWatch, Inc. were acquired on or about January 27, 2000. This included hiring substantially all of the employees of LifeWatch, retaining the same premises and assuming the contracts of LifeWatch, and using the LifeWatch name, which was also purchased as part of the transaction.

8. Urs Acquisitions, Inc. changed its name to LifeWatch Holding Corporation, and LifeWatch Holding Corporation later changed its name to LifeWatch Services Inc., which is the current name of the company.

I declare the foregoing is true and correct to the best of my knowledge.

Executed this 21 of September, 2010 at Roxmont, IL.



Craig Foley

Roxmont, IL